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January 20, 2023

Hon. Colleen McMahon  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

By Electronic Filing.

Re: In Re: New York City Policing During Summer 2020 Demonstrations,  
 20-cv-8924 (CM)(GWG) –  
 This filing is related to Hernandez, 21-cv-7406 and Minett, 21-cv-8161

Dear Judge McMahon:

My firm and co-counsel represent the Plaintiffs in *Hernandez, et al. v. City of New York, et al.*, and *Minett v. City of New York, et al.*, which were consolidated into the *In Re: New York City Policing During Summer 2020 Demonstrations*, 20-cv-8924 (CM)(GWG) docket for discovery purposes. Both *Hernandez* and *Minett* resolved on a Rule 68 offer, each of which also provided for attorneys' fees. Currently, an application for attorney's fees would be due on January 23, 2022.

The parties reached an agreement in principle as to attorney's fees on January 12, 2023. Despite repeated requests, Defendants have not yet sent proposed settlement paperwork for Plaintiffs' review. Given that, Plaintiffs in both the *Hernandez* and *Minett* matters ask the Court to grant an extension of the time for 30 days, until February 22, 2023, for Plaintiffs to file the fee applications in both *Minett* and *Hernandez*, should the process of reducing the settlement to writing not be successful.

Defendants oppose this request.

As always, we thank the Court for its continued time and attention.

Respectfully submitted,

/s/

Elena L. Cohen

Honorific/ Pronouns: Ms., she/ her/ her

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All relevant parties by electronic filing.

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